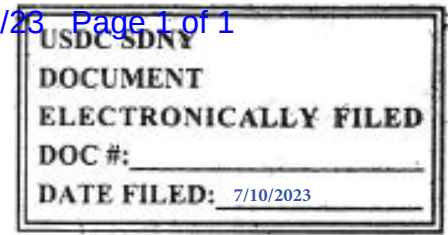


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GUSTAVE H. NEWMAN (1927-2017)

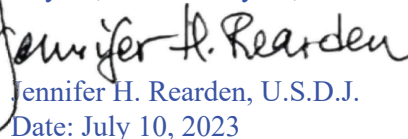
WILLIAM J. DOBIE

July 7, 2023

BY ECF

Hon. Jennifer H. Rearden
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

The unopposed application is GRANTED. Defendant Lieberman's conditions of bail are hereby modified to permit the temporary return of his wife Bella's passport, from July 11, 2023 to July 13, 2023. All other conditions of bail shall remain in effect.


Jennifer H. Rearden, U.S.D.J.
Date: July 10, 2023

SO ORDERED.

Re: *United States v. Martin Handler, et al.*, 23-cr-004 (JHR)
(Unopposed Application to Temporarily Modify Bail Conditions)

Dear Judge Rearden:

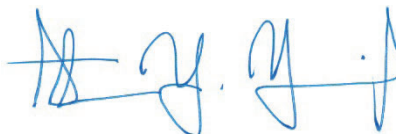
This firm represents Menachem Lieberman, one of the defendants in the above-referenced matter. I am writing to request that the Court modify Mr. Lieberman's conditions of release in order to facilitate his wife Bella's travel to and from Montreal on Wednesday, July 12, 2023. As part of the bail package in this case, and because Mr. Lieberman is a dual US/Candian citizen, both Mr. Lieberman and Bella (and their four minor children) surrendered their passports. Mr. Lieberman's bail is also secured by a confession of judgment on his home and by two sureties. To facilitate Bella's trip to Canada, we are requesting that her passport be briefly returned to her.

The Lieberman's son is engaged to be marry. Prior to the wedding of a child there is a Jewish custom to formally invite the deceased grandparents by going to their gravesite prior to the wedding. Mr. Lieberman's wife Bella would like to travel to Montreal next week for the day (Wednesday) to go her grandparent's gravesite. All of her children and Mr. Lieberman would remain back in the United States. Back in March, Your Honor approved a similar modification to permit Bella to travel to Montreal, and she came and went without incident.

I have communicated with both the government (AUSA Wolf) and Mr. Lieberman's PTS Officer and neither have any objection to the return of Bella's passport to facilitate the trip.

Accordingly, we respectfully request that the Court modify Mr. Lieberman's conditions of release to permit the temporary return of his wife Bella's passport from Tuesday, July 11 to Thursday, July 13. Please let me know.

Respectfully submitted,



Steven Y. Yurowitz

cc: AUSA Daniel Wolf (by ECF)
PTS Officer Taelor Nisbeth (by email)